

THE ROSEN LAW FIRM, P.A.

Laurence Rosen

Jing Chen

609 W. South Orange Avenue

Suite 2P

South Orange, NJ 07079

Telephone: (973) 313-1887

Fax: (973) 833-0399

lrosen@rosenlegal.com

jchen@rosenlegal.com

Counsel for Lead Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ETIENNE BALON, INDIVIDUALLY
AND ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Plaintiff,

vs.

AGRIA CORPORATION, GUANGLIN
LAI, XIE TAO, JOHN FULTON, and
WAH KWONG TSANG,

Defendants.

No.: 2:16-cv-08376-SDW-LDW

CLASS ACTION

**LEAD PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND PLAN OF
ALLOCATION**

Hon. Susan D. Wigenton

PLEASE TAKE NOTICE that pursuant to the Court's Text Order dated October 27, 2017 (Dkt. # 31), on December 12, 2017, at 11:00 a.m. at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Courtroom 5C, Newark, NJ, 07101, before the Honorable Susan D. Wigenton, United States District Judge, Lead Plaintiffs Etienne Balon and Xiao Ming Zhou, through their undersigned Counsel, will move for final approval of the class action Settlement and Plan of Allocation of Settlement proceeds.

Lead Plaintiffs' motion is based on the Memorandum of Law in Support; the Declaration of Laurence Rosen in Support of Final Approval of Settlement and Award of Attorneys' Fees and Expenses, and the exhibits thereto; the Stipulation of Settlement filed June 30, 2017 and the exhibits thereto (Dkt. #25-1); and all other pleadings and matters of record and such additional evidence or arguments as may be presented at the hearing.

Dated: November 7, 2017

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Laurence Rosen
Laurence Rosen, Esq.
Jing Chen, Esq.
609 W. South Orange Avenue
Suite 2P
South Orange, NJ 07079
Tel: (973) 313-1887
Fax: (973) 833-0399
lrosen@rosenlegal.com

jchen@rosenlegal.com

Counsel for Lead Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of November, 2017 a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence Rosen
Laurence Rosen